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LAW OFFICES  
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST  
2120 L STREET, NW  
WASHINGTON, DC 20037

HAROLD MORDKOFKY  
BENJAMIN H. DICKENS, JR.  
JOHN A. PRENDERGAST  
GERARD J. DUFFY  
RICHARD D. RUBINO  
MARY J. SISAK  
D. CARY MITCHELL  
KATHLEEN A. KAERCHER  
MICHAEL B. ADAMS, JR.  
DOUGLAS W. EVERETTE

(202) 659-0830  
FACSIMILE: (202) 828-5568

ARTHUR BLOOSTON  
1914 - 1999

October 3, 2001

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

WRITER'S CONTACT INFORMATION  
202-828-5510

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES  
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON  
OF COUNSEL

PERRY W. WOOFER  
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ  
DIRECTOR OF ENGINEERING  
PRIVATE RADIO

By Messenger

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *Notice of Ex Parte Presentation*  
CC Docket 96-45, Western Wireless Corporation  
Petition for Designation as an Eligible Telecommunications  
Carrier for the Pine Ridge Reservation in the State of South Dakota

Dear Ms. Salas:

On March 12, 2001, Comments were filed on behalf of Golden West Telecommunications Cooperative, Inc. ("Golden West") in the above-referenced proceeding. In these Comments, Golden West submitted that the Eligible Telecommunications Carrier ("ETC") Petition by Western Wireless Corporation ("Western Wireless") did not meet the public interest requirements of Section 214(e)(6) of the Telecommunications Act of 1996. Specifically, the Comments noted that Western Wireless had not addressed key questions concerning the impact of its ETC designation upon Golden West's remaining subscribers after competitive inroads are made within its subscriber base. See Golden West Comments at 13-15.

Subsequently, on September 21, 2001, Golden West submitted an analysis by Robert C. Schoonmaker, Vice President of GVNW Consulting, Inc., of the adverse rate and revenue impacts upon Golden West and its remaining customer base if Western Wireless is granted ETC status.

With this filing, Golden West is supplementing Mr. Schoonmaker's analysis with an Declaration by George Strandell, the General Manager of Golden West, indicating that the projected revenue losses will force Golden West to cancel or postpone plans to upgrade the plant of as many as fourteen exchanges. This Declaration is supplied under penalty of and is attached herewith.

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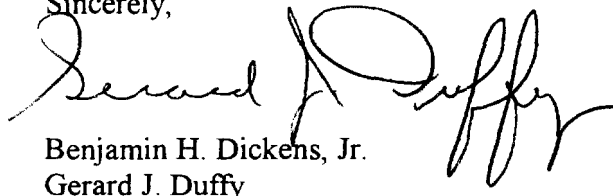
Magalie Roman Salas  
October 3, 2001  
Page 2

Please note that the signature page of the attached Declaration is a facsimile. Golden West will file the original, signed copy of the Declaration as a supplement.

Pursuant to Section 1.1206(b)(1) of the Commission's Rules, 47 C.F.R. Section 1.1206(b)(1), an original plus four copies of this letter are being provided to you for inclusion in the public record of the above-referenced proceeding.

Please direct any questions to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Benjamin H. Dickens, Jr.", with a stylized flourish at the end.

Benjamin H. Dickens, Jr.  
Gerard J. Duffy

cc: Chairman Michael K. Powell  
Commissioner Kathleen Q. Abernathy  
Commissioner Michael J. Copps  
Commissioner Kevin J. Martin  
Dorothy Attwood  
Andrea Kearney

Attachment

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Western Wireless Corporation Petition for	)	
Designation as an Eligible Telecommunications	)	
Carrier for the Pine Ridge Reservation in	)	
South Dakota	)	

**DECLARATION UNDER PENALTY OF PERJURY**

1, George Strandell, hereby state the following under penalty of perjury:

1. I am the General Manager of Golden West Telecommunications Cooperative (Golden West). I have worked for Golden West for over 30 years, and am very familiar with virtually all aspects of its local exchange operations, including its revenue sources, financial planning, and infrastructure investment programs and plans.

2. I have reviewed the "Declaration Under Penalty Of Perjury" of Robert C. Schoonmaker of GVNW Consulting, dated September 21, 2001, which was submitted on behalf of Golden West in this proceeding on September 21, 2001. On the basis of my experience at Golden West, I believe that Mr. Schoonmaker has accurately estimated the adverse impacts on Golden West's revenues and rates that would result from the designation of Western Wireless as an Eligible Telecommunications Carrier (ETC) on the Pine Ridge Reservation.

3. Mr. Schoonmaker accurately indicated that adverse revenue and rate impacts would decrease Golden West's ability to invest in telecommunications infrastructure.

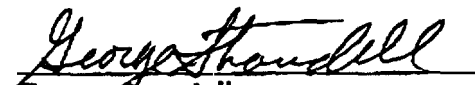
4. Golden West annually invests, on average, \$6 to \$7 million in infrastructure improvements. Whereas our Pine Ridge exchange and others have been upgraded to furnish broadband capabilities to most of their customers, fourteen of Golden West's exchanges still need substantial upgrades. Three of these exchanges have 1972-vintage plant, and require replacement of their cable plant and electronics before they can offer broadband services. The remaining eleven exchanges have 1976-1978-vintage plant, and were upgraded on an interim basis with digital loop carrier facilities during the past two years to improve their voice services. More extensive upgrades need to be completed to equip these eleven exchanges with broadband capabilities.

5. At present, Golden West has specific plans to upgrade one of the three exchanges with 1972-vintage plant during 2002, and a second during 2003. If future

revenue and economic conditions remained relatively similar to those in the past, I would expect that plans would be made to upgrade the third exchange with 1972-vintage plant during 2004, and that most or all of the eleven exchanges with digital loop carrier would be upgraded between 2005 and 2008.

6. However, if Golden West loses \$1,166,000 to \$2,562,000 of annual revenues (as Mr. Schoonmaker estimates) due to the designation of Western Wireless as an ETC on the Pine Ridge Reservation, these present and future infrastructure investment plans will be re-evaluated and cut back. I believe that the plans to upgrade the two exchanges during 2002 and 2003 will be postponed for at least several years, and very possibly reduced in scope and cost, or cancelled. Likewise, the commencement of the future upgrades to the eleven digital loop carrier exchanges will be postponed; the upgrades will be spread out over a longer period; and the scope and cost of the upgrades will be reduced.

Under penalty of perjury, I certify that this Declaration was prepared under my direction, and that it is true and accurate to the best of my knowledge, information and belief.

  
George Strandell

Date: Oct 3, 2001